

FILED

OCT 20 2021

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

**ROSALIO CANO, JR. (1),
VERONICA ORTEGA (2),
and
ANDREW CARRILLO (3),**

Defendants.

SA-21-CR-00438-FB

SUPERSEDING INDICTMENT

COUNT 1: 18 U.S.C. § 1201(a)(1) & (c),
Conspiracy to Kidnap

COUNT 2: 8 U.S.C. § 1324(a)(1)(A)(ii),
(v)(I) & (B)(iii), Conspiracy to Transport
Illegal Aliens Resulting in Serious Bodily
Injury

COUNT 3: 8 U.S.C. § 1324(a)(1)(A)(iii),
(v)(I) & (B)(iii), Conspiracy to Harbor Illegal
Aliens Resulting in Serious Bodily Injury

COUNT 4: 8 U.S.C. § 1324(a)(1)(A)(ii),
(v)(I) & (B)(i), Conspiracy to Transport
Illegal Aliens

COUNT 5: 8 U.S.C. § 1324(a)(1)(A)(iii),
(v)(I) & (B)(i), Conspiracy to Harbor Illegal
Aliens

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. §1201(a)(1) & (c)]

Beginning on or about September 8, 2021 and continuing through September 17, 2021, in the
Western District of Texas, and elsewhere, Defendants,

**ROSALIO CANO JR. (1)
VERONICA ORTEGA (2),
and ANDREW CARRILLO (3)**

together, and with others known and unknown to the grand jury, did combine, conspire, confederate,
and agree to unlawfully and willfully seize, confine, and kidnap, and hold for ransom, reward, or
otherwise an individual, C.R.G., and in committing or in furtherance of the commission of the offense

used a cellular telephone, a means, facility, and instrumentality of interstate or foreign commerce in violation of Title 18, United States Code, Sections 1201(a)(1) & (c).

OVERT ACTS:

In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed in the Western District of Texas and elsewhere:

- 1) On or about September 13, 2021, ROSALIO CANO JR. and two other individuals went to the location where C.R.G. was being held within the Western District of Texas after entering into the United States illegally from the Republic of Mexico.
- 2) On or about September 15, 2021, unknown coconspirators contacted C.R.G.'s family members and demand a payment in the amount of \$4,000 for C.R.G.'s release.
- 3) On or about September 13, 2021, ROSALIO CANO JR. assisted in the transportation of C.R.G. from his original location to a second location in or around San Antonio, Texas.
- 4) On or about September 14, 2021, unknown coconspirators contacted C.R.G.'s family members when they failed to pay \$4,500 for C.R.G.'s release, and raised the demand for payment for C.R.G.'s release to \$6,000.
- 5) On or about September 15, 2021, ROSALIO CANO JR. picked up C.R.G. from the second location and drove him to a third location in or around San Antonio, Texas.
- 6) On or about and between September 15, 2021 and September 17, 2021, ROSALIO CANO JR. did not allow C.R.G. to leave the third location.
- 7) On or about September 15, 2021, unknown coconspirators contacted C.R.G.'s family members and raised the demand for payment from \$6,000 to \$11,000 for C.R.G.'s release.
- 8) On or about September 15, 2021, unknown coconspirators contacted C.R.G.'s family members, and said family members were able to negotiate the demand for payment from

\$11,000 to \$9,000 for C.R.G.'s release.

- 9) On or about September 17, 2021, ROSALIO CANO JR. and ANDREW CARRILLO both were located at the third location with C.R.G. before leaving together but in separate vehicles.
- 10) On or about September 17, 2021, ROSALIO CANO JR. placed a pistol in his pocket in front of C.R.G. and stated in sum and substance to C.R.G. that if anything goes wrong, C.R.G. will pay.
- 11) On or about September 17, 2021, ROSALIO CANO JR. placed a pistol on the seat of the vehicle he was driving, with C.R.G. in the front seat, and locked the doors so C.R.G. could not exit.
- 12) On or about September 17, 2021, ROSALIO CANO JR. drove C.R.G. to a predetermined location in San Antonio, Texas to release him to a family member of C.R.G. in exchange for money.
- 13) On or about September 17, 2021, ANDREW CARRILLO and VERONICA ORTEGA travelled together in a vehicle to a predetermined location to receive United States Currency for the release of C.R.G.
- 14) On or about September 17, 2021, VERONICA ORTEGA demanded that United States Currency be turned over to her and ANDREW CARRILLO before C.R.G. could exit ROSALIO CANO JR.'s vehicle.
- 15) On or about September 17, 2021, VERONICA ORTEGA stated C.R.G. could not exit ROSALIO CANO JR.'s vehicle until she and ANDREW CARRILLO counted the United States Currency that VERONICA ORTEGA had received.
- 16) On or about September 17, 2021, ROSALIO CANO JR. instructed C.R.G. that he was not

allowed to exit the vehicle they were in until the United States Currency was counted by VERONICA ORTEGA and ANDREW CARRILLO.

17) On or about September 17, 2021, VERONICA ORTEGA and ANDREW CARRILLO received approximately \$9,000 in United States Currency.

18) On or about September 17, 2021, VERONICA ORTEGA and ANDREW CARRILLO split into two groups and counted the \$9,000 in United States Currency that they had received.

All in furtherance and violation of 18 U.S.C. §§1201(a)(1) & (c).

COUNT TWO
[8 U.S.C. §§ 1324(a)(1)(A)(ii), (v)(I) & (B)(iii)]

Beginning on or about September 8, 2021, and continuing through on or about September 17, 2021, in the Western District of Texas, and elsewhere, Defendant,

**ROSALIO CANO JR. (1),
VERONICA ORTEGA (2),
and ANDREW CARRILO (3),**

together, and with others known and unknown, did combine, conspire, confederate, and agree to transport, and attempt to transport and move, aliens within the United States by means of transportation and otherwise, while knowing and in reckless disregard of the fact that the aliens had come to, entered, and remained in the United States, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(I);

During which and in relationship to this offense, Defendants' conduct caused serious bodily injury to, and placed in jeopardy the life of, one or more persons, in violation of Title 8, United States Code, Section 1324(a)(1)(B)(iii).

COUNT THREE

[8 U.S.C. § 1324(a)(1)(A)(iii), (v)(I) & (B)(iii)]

Beginning on or about September 8, 2021, and continuing through on or about September 17, 2021, in the Western District of Texas, and elsewhere, Defendants,

**ROSALIO CANO JR. (1),
VERONICA ORTEGA (2),
and ANDREW CARRILO (3),**

together, and with others known and unknown to the Grand Jury, did combine, conspire, confederate, and agree to conceal, harbor, and shield from detection, and attempt to conceal, harbor and shield from detection, in buildings and other places and by means of transportation, aliens who had come to, entered, and remained in the United States in violation of law, while knowing and in reckless disregard of the fact that the aliens had come to, entered, and remained in the United States in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), and (v)(I).

During which and in relationship to this offense, Defendants' conduct caused serious bodily injury to, and placed in jeopardy the life of, one or more persons in violation of Title 8, United States Code, Section 1324(a)(1)(B)(iii).

COUNT FOUR

[8 U.S.C. § 1324(a)(1)(A)(ii), (v)(I) & (B)(i)]

Beginning on or about September 8, 2021, and continuing through on or about September 17, 2021, in the Western District of Texas, and elsewhere, Defendants,

**ROSALIO CANO JR. (1),
VERONICA ORTEGA (2),
and ANDREW CARRILO (3),**

together, and with others known and unknown, did combine, conspire, confederate, and agree to transport, and attempt to transport and move, aliens within the United States by means of transportation and otherwise, while knowing and in reckless disregard of the fact that the aliens had come to, entered, and remained in the United States, in violation of Title 8, United States Code,

Sections 1324(a)(1)(A)(ii) and (v)(I) and 1324(a)(1)(B)(i).

COUNT FIVE

[8 U.S.C. § 1324(a)(1)(A)(iii), (v)(I) & (B)(i)]

Beginning on or about September 8, 2021, and continuing through on or about September 17, 2021, in the Western District of Texas, and elsewhere, Defendants,

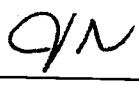
**ROSALIO CANO JR. (1),
VERONICA ORTEGA (2),
and ANDREW CARRILO (3),**

together, and with others known and unknown to the Grand Jury, did combine, conspire, confederate, and agree to conceal, harbor, and shield from detection, and attempt to conceal, harbor and shield from detection, in buildings and other places and by means of transportation, aliens who had come to, entered, and remained in the United States in violation of law, while knowing and in reckless disregard of the fact that the aliens had come to, entered, and remained in the United States in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), (v)(I) and (B)(i).

A TRUE BILL


FOREPERSON

ASHLEY C. HOFF
United States Attorney

By: 

FOR AMY MARIE HAIL
Assistant United States Attorney